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December 15, 2022

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, New York 11201

Re: Falls Lake v. Kalnitech Construction Corp. et. al.
Docket No: 1:22-cv-01473-KAM-PK
Our File No: 19-208

Dear Judge Kuo,

We represent the plaintiff, Falls Lake National Insurance Company ("Falls Lake"), in this action. I write today, to submit a revised joint proposed discovery plan as directed in Your Honor's Order of December 13, 2022.

Respectfully submitted,
MIRANDA SLONE SKLARIN VERVENIOTIS LLP

s/Steven Verveniotis

Steven Verveniotis

cc: All Counsel Via ECF

Case Name: Falls Lake v. Kalnitech Construction Corp., et al. Case Number: 22-cv-01473 (KAM)(PK)

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

E

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held			January 17, 2023
2. Rule 26(a)(1) disclosures exchanged			January 30, 2023
3. Requested:			
a. Medical records authorization		X	
b. Section 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants		X	
4. Procedures for producing Electronically Stored Information (ESI) discussed		X	
5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website)		X	
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand			February 15, 2023
2. Defendant to make settlement offer			March 15, 2023
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)			April 17, 2023
4. Settlement Conference (proposed date)			April 17, 2023
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings		X	
2. Initial documents requests and interrogatories			January 17, 2023
3. All fact discovery to be completed (including disclosure of medical records)			March 15, 2023
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			April 17, 2023

5. Expert discovery (only if needed)		<i>Check here if not applicable</i>	
Plaintiff expert proposed field(s) of expertise:	N/A		
Defendant expert proposed field(s) of expertise:	N/A		
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due		X	
b. Rebuttal expert reports due		X	
c. Depositions of experts to be completed		X	
6. Completion of ALL DISCOVERY (if different from C.3)			April 16, 2023
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			April 30, 2023
8. If any party seeks a dispositive motion , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion			April 28, 2023
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			May 30, 2023
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			Yes No X
2. All parties consent to Magistrate Judge jurisdiction for trial?			Yes No X
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			N/A
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO

United States Magistrate Judge

Date